## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

Harry Gao and Roberta Socall, on behalf of	)	
themselves and all others similarly situated,	)	
	)	
Plaintiffs,	)	
V.	)	
	)	Docket No: 1:14-cv-4281 (PAC)
JP Morgan Chase & Co., and Chase Bank	)	
USA, N.A.,	)	
	)	
Defendants.	)	

## PLAINTIFFS' NOTICE OF [unopposed] UPDATED MOTION FOR APPROVAL OF ATTORNEYS' FEES AND SERVICE AWARDS AND REIMBURSEMENT OF COSTS

PLEASE TAKE NOTICE that Plaintiffs, Harry Gao and Roberta Socall, (collectively, "Plaintiffs") will move this Court before the Honorable Paul A. Crotty, at the Daniel Patrick Moynihan United States Courthouse located at 500 Pearl Street, Courtroom 14-C, New York, NY 10007-1312, for an Order approving Plaintiffs' Updated Motion for Approval of Attorneys' Fees and Service Awards and Reimbursement of Costs.

**PLEASE TAKE FURTHER NOTICE,** that in support of its motion, Plaintiffs will rely on the Memorandum of Law and the Declaration of Class Counsel submitted in support of this motion. A proposed Order has also been submitted.

Dated: May 31, 2017 /s/ Kenneth J. Grunfeld

Richard M. Golomb, Esquire rgolomb@golombhonik.com
Kenneth J. Grunfeld, Esquire kgrunfeld@golombhonik.com
Golomb & Honik P.C.

Golomb & Honik, P.C. 1515 Market Street, Suite 1100 Philadelphia, PA 19102 Tel. 215-985-9177 Fax. 215-985-4169

Ted Trief, Esquire
ttrief@triefandolk.com
Barbara Olk, Esquire
bolk@triefandolk.com
Trief & Olk
150 E. 58th St., 34th Floor
New York, NY 10155

Tel.: 212-486-6060 Fax: 212-317-2946

Attorneys for Plaintiffs and the Proposed Class

**CERTIFICATE OF SERVICE** 

I, Kenneth J. Grunfeld, Esquire, hereby certify that on this 31th day of May, 2017, I

caused a true and correct copy of the foregoing Plaintiffs' Notice of Updated Motion for

Approval of Attorneys' Fees and Service Awards and Reimbursement of Costs, to be filed

and served via the Court's CM/ECF filing system on all counsel of record.

Date: May 31, 2017

/s/ Kenneth J. Grunfeld

KENNETH J. GRUNFELD, ESQUIRE

## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

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themselves and all others similarly situated,	)	
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	)	
JP Morgan Chase & Co., and Chase Bank	)	
USA, N.A.,	)	
	)	
Defendants.	)	

## PLAINTIFFS' UNOPPOSED UPDATED MOTION FOR APPROVAL OF ATTORNEYS' FEES AND SERVICE AWARDS AND REIMBURSEMENT OF COSTS

Plaintiffs, HARRY GAO and ROBERTA SOCALL (collectively, "Plaintiffs"), by and through their counsel, hereby move for an entry of an order, a proposed copy of which is attached hereto, pursuant to Fed. R. Civ. P. 23(h) and 54(d)(2), granting the follow relief:

- 1) An award to Class Counsel of \$765,000.00 in attorneys' fees;
- 2) A reimbursement to Class Counsel of \$35,324.12 in costs and other litigation expenses; and
- 3) Service Awards to the Harry Gao and Roberta Socall, the two named Plaintiff Class Representatives, in the amount of \$7,500.00 each, and totaling \$15,000.00.

This motion will be heard on September 12, 2017 at 4:30 p.m, or on such date as may be specified by the Court, at Courtroom 14C, 500 Pearl Street, New York, New York 10007-1312 before the Honorable Judge Paul A. Crotty, concurrent with Plaintiffs' anticipated Updated Motion for Final Approval of Class Action, which will be separately briefed.

This motion is based on the incorporated Memorandum of Law, the Declaration in Support of Plaintiffs' Motion and attached exhibits; the Settlement Agreement (D.E. # 70-1); the October 25, 2016 Amended Order Granting Preliminary Approval of the Class Settlement at D.E. # 72; Plaintiffs' original Unopposed Motion for Attorneys' Fees, Costs, and Service

Awards along with all documents filed contemporaneously therewith [D.E. 74-76]; the Parties' Modification and Supplement to the Settlement Agreement and Release [D.E. 84-1]; and the April 3, 2017 Supplemental Notice Approval Order Granting Joint Motion to Reschedule the Final Approval Hearing and Approving Supplemental Notice [D.E. 85]; the anticipated Motion for Final Approval and accompanying documentation (to be filed on or before August 29, 2017) and declarations and exhibits attached thereto; the records in this Action; and on such further oral and documentary evidence which may be submitted, and any further evidence as the Court may receive.

Upon this filing, a copy of this Motion and the attachments will be posted to the settlement website, <a href="http://www.chaserewardsprogramsettlement.com">http://www.chaserewardsprogramsettlement.com</a>, where it can easily be accessed by Settlement Class Members.

**Dated:** May 31, 2017

/s/ Kenneth J. Grunfeld

Richard M. Golomb, Esquire rgolomb@golombhonik.com
Kenneth J. Grunfeld, Esquire kgrunfeld@golombhonik.com
Golomb & Honik, P.C.
1515 Market Street, Suite 1100
Philadelphia, PA 19102
Tel. 215-985-9177
Fax. 215-985-4169

Ted Trief, Esquire <a href="mailto:ttrief@triefandolk.com">ttrief@triefandolk.com</a>
Barbara Olk, Esquire <a href="mailto:bolk@triefandolk.com">bolk@triefandolk.com</a>
Trief & Olk <a href="mailto:150">150</a> E. 58th St., 34th Floor New York, NY 10155 Tel.: 212-486-6060

Fax: 212-317-2946

Attorneys for Plaintiffs and the Proposed Class

**CERTIFICATE OF SERVICE** 

I, Kenneth J. Grunfeld, Esquire, hereby certify that on this 31st day of May, 2017, I

caused a true and correct copy of the foregoing Plaintiffs' Updated Motion for Approval of

Attorneys' Fees and Service Awards and Reimbursement of Costs, to be filed and served via

the Court's CM/ECF filing system on all counsel of record.

Date: May 31, 2017

/s/ Kenneth J. Grunfeld

KENNETH J. GRUNFELD, ESQUIRE

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